Case: 2:07-cr-00165-ALM Doc #: 4 Filed: 07/27/07 Page: 1 of 2 PAGEID #: 4

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

07 JUL 27 PM 3:38

UNITED STATES OF AMERICA

v.

2:07 cr 165

NO.

29 U.S.C. §501(c)

JUDGE MARBLEY

WILLIAM J. PAGANO

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

- 1. At all times hereinafter mentioned and within the meaning of Sections 3(i) and 3(j) of the Labor-Management Reporting and Disclosure Act of 1959, 29 U.S.C. §402(i) and §402(j), hereinafter referred to as the Act:
- (a) National Association of Letter Carriers, "NALC", Branch 78, is a labor organization representing employees in an industry affecting interstate commerce in Columbus, Ohio.
- (b) At all times relevant herein, the defendant, WILLIAM J. PAGANO, was the Secretary-Treasurer, National Association of Letter Carriers, Branch 78, and as such was an officer and an employee of a labor organization within the meaning of sections 3(f) and 3(n) of the Act [29 U.S.C. §§402(f) and (n)].
 - 2. From on or about February 25, 2000, to on or about

December 5, 2006, in the Southern District of Ohio, the defendant, WILLIAM J. PAGANO, while an officer, that is, Secretary-Treasurer, National Association of Letter Carriers, Branch 78, a labor organization in an industry affecting commerce, did willfully and knowingly embezzle and convert to his own use the moneys and funds of said labor organization in the approximate amount of \$66,759.18

In violation of 29 U.S.C. §501(c).

GREGORY G. LOCKHART UNITED STATES ATTORNEY

GARY V. SPARTIS

DEPUTY CRIMINAL CHIEF